

BEFORE THE FEDERAL ELECTION COMMISSION

)
) **MUR 7540**
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RESPONSE OF DONALD J. TRUMP FOR PRESIDENT, INC. AND BRADLEY T. CRATE, AS TREASURER, TO THE COMPLAINT

By and through undersigned counsel, Donald J. Trump for President, Inc. and Treasurer Bradley T. Crate (collectively, “the Campaign”) respond to the Complaint in the above-captioned MUR, which must be dismissed immediately.

The Complaint contends that the Campaign violated federal campaign-finance laws by making a \$10,000 donation of campaign funds on September 28, 2018, to Paws Place Dog Rescue, a 501(c)(3) charitable organization in North Carolina, “to help [Paws Place] rebuild [its] kennels destroyed by the flooding during Hurricane Florence” earlier that month. Compl. 1; *see also, e.g.*, Paws Place Dog Rescue, Sept. 17, 2018, <http://www.pawsplace.org/2018/09/kennel-closed-until-further-notice> (describing the flooding during the hurricane). Yet the Federal Election Campaign Act and FEC regulations permit campaigns to use their funds for such charitable giving. *See* 52 U.S.C. § 30114(a)(3); 11 C.F.R. § 113.1(g)(2). The Complaint’s attempt to vilify an act of charity thus falls flat, and the Commission must dismiss the Complaint and close the file. *See* 11 C.F.R. § 111.4(d)(3) (requiring complaints set forth a “clear and concise recitation of the facts which describe a violation of statute or regulation over which the Commission has jurisdiction”).

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